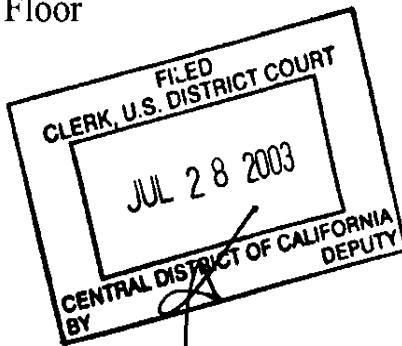


Stip&Order(Dismissal)_30707

1 MICHAEL D. MORIN, ESQ., SBN: 113475
2 MARGOLIS & MORIN LLP
3 444 South Flower Street, 6th Floor
4 Los Angeles, CA 90071
5 Telephone 213-683-0300
6 Fax 213-683-0303

7 Attorneys for Plaintiff
8 **RENA MERO**



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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

RENA MERO,

Case No. **CV-02-9801 RGK (STLx)**

Plaintiff,

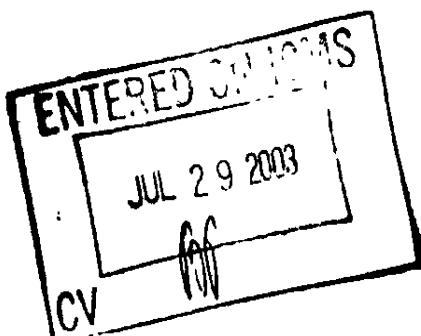
v.

WESTERN INTERNATIONAL
SYNDICATION, a California Corp.

Defendant.

**STIPULATION OF DISMISSAL OF
ENTIRE ACTION PURSUANT TO
F.R.C.P. RULE 41(a)(1)**

Action Filed: July 26, 2001



1 IT IS HEREBY STIPULATED by and between Plaintiff, RENA MERO and
 2 Defendant and Third-Party Plaintiff WESTERN INTERNATIONAL
 3 SYNDICATION, INC., and Third Party Defendants VICTOR & GRAIS, VICTOR &
 4 GRAIS PRODUCTIONS, MARK VICTOR, MICHAEL GRAIS; HILLTOP
 5 ENTERTAINMENT, LLC; HARELL GOLDSTEIN, PEACE ARCH
 6 ENTERTAINMENT GROUP INC., IMMORTAL PRODUCTIONS INC., and
 7 ARTHUR LIEBERMAN, that the complaint and all counter-claims filed herein be
 8 and are hereby dismissed, with prejudice, pursuant to FRCP 41(a)(1)(ii).

9 Dated: July 28, 2003

MARGOLIS & MORIN LLP

10
 11 By: Michael D. Morin
 12 MICHAEL D. MORIN
 Attorney for Plaintiff,
 13 RENA MERO

Date: July , 2003

GARFIELD TEPPER & RASKIN

14
 15 By: Gary S. Raskin
 16 GARY S. RASKIN

17 Attorneys for Defendant and Third-Party
 18 Plaintiff Western International Syndication,
 Inc.

19 Date: July , 2003

GORRY MEYER & RUDD LLP

20
 21 BY: Christopher L. Rudd
 22

23 Attorneys for Third Party Defendants
 24 Victor & Grais, Victor & Grais Productions,
 Mark Victor and Michael Grais

25
 26 IT IS SO ORDERED

27 Dated July 28 2003

28 Gary Klausner
 United States District Judge
 GARY KLAUSNER

JUL-23-2003 10:37

Margolis & Morin LLP/PLA #6

213 683 0303 P.03

Sup & Order (Dismissal) 30707

1 IT IS HEREBY STIPULATED by and between Plaintiff, RENA MERO and
 2 Defendant and Third-Party Plaintiff WESTERN INTERNATIONAL
 3 SYNDICATION, INC., and Third Party Defendants VICTOR & GRAIS, VICTOR &
 4 GRAIS PRODUCTIONS, MARK VICTOR, MICHAEL GRAIS; HILLTOP
 5 ENTERTAINMENT, LLC; HARELL GOLDSTEIN, PEACE ARCH
 6 ENTERTAINMENT GROUP INC., IMMORTAL PRODUCTIONS INC., and
 7 ARTHUR LIEBERMAN, that the complaint and all counter-claims filed herein be
 8 and are hereby dismissed, with prejudice, pursuant to FRCP 41(a)(1)(ii).

9 Dated: July ___, 2003

MARGOLIS & MORIN LLP

13 Date: July 23, 2003

GARFIELD TEPPER & RASKIN

15 By: 

16 MICHAEL D. MORIN

17 Attorney for Plaintiff,
18 RENA MERO

19 Date: July ___, 2003

20 GORRY MEYER & RUDD LLP

21 BY: 22 CHRISTOPHER L. RUDD
23 Attorneys for Third Party Defendants
24 Victor & Grais, Victor & Grais Productions,
25 Mark Victor and Michael Grais

1 IT IS HEREBY STIPULATED by and between Plaintiff, RENA MERO and
2 Defendant and Third-Party Plaintiff WESTERN INTERNATIONAL
3 SYNDICATION, INC., and Third Party Defendants VICTOR & GRAIS, VICTOR &
4 GRAIS PRODUCTIONS, MARK VICTOR, MICHAEL GRAIS; HILLTOP
5 ENTERTAINMENT, LLC; HARELL GOLDSTEIN, PEACE ARCH
6 ENTERTAINMENT GROUP INC., IMMORTAL PRODUCTIONS INC., and
7 ARTHUR LIEBERMAN, that the complaint and all counter-claims filed herein be
8 and are hereby dismissed, with prejudice, pursuant to FRCP 41(a)(1)(ii).

9 Dated: July ___, 2003

MARGOLIS & MORIN LLP

10 By: _____
11

12 MICHAEL D. MORIN
13 Attorney for Plaintiff,
14 RENA MERO

15 Date: July ___, 2003

GARFIELD TEPPER & RASKIN

16 By: _____
17

18 GARY S. RASKIN
19 Attorneys for Defendant and Third-Party
20 Plaintiff Western International Syndication,
21 Inc.

22 Date: July 14, 2003

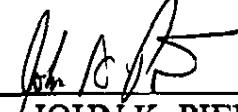
GORRY MEYER & RUDD LLP

23 BY: _____
24

25 CHRISTOPHER L. RUDD
26 Attorneys for Third Party Defendants
27 Victor & Grais, Victor & Grais Productions,
28 Mark Victor and Michael Grais

1 Date: July 14, 2003

PIERSON LAW FIRM A.P.L.C.

2 By: 

JOHN K. PIERSON

3 Attorneys for Third Party Defendants
4 Hilltop Entertainment, LLC

5
6 Date: July ___, 2003

LINER YANKELEVITZ SUNSHINE &
7 REGENSTREIF LLP

8 By: 

JOSEPH M. GABRIEL

9 Attorneys for Third Party Defendants Peace
10 Arch Entertainment Group Inc. and Immortal
11 Productions Inc.

12
13 Date: July ___, 2003

LAW OFFICES OF RONALD A. LITZ

14
15 BY: 

16 RONALD A. LITZ

17 Attorney for HARELL GOLDSTEIN

18
19 Dated: July ___, 2003

20 By: 

21 ARTHUR LIEBERMAN

In Pro Per

JUL-10-2003 10:44

Margolis & Morin LLP LA

#9

P.04/04

Stip&Order(Dismissal)_30707

1 Date: July ___, 2003

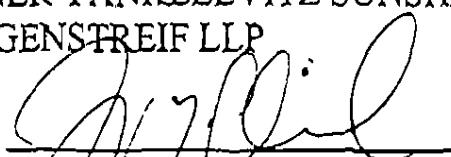
PIERSON LAW FIRM A.P.L.C.

2 By: _____

3 JOHN K. PIERSON

4 Attorneys for Third Party Defendants
5 Hilltop Entertainment, LLC

6 Date: July ___, 2003

7 LINER YANKELEVITZ SUNSHINE &
8 REGENSTREIF LLP9 By: 

10 JOSEPH M. GABRIEL

11 Attorneys for Third Party Defendants Peace
12 Arch Entertainment Group Inc. and Immortal
13 Productions Inc.

14 Date: July ___, 2003

15 LAW OFFICES OF RONALD A. LITZ

16 BY: _____

17 RONALD A. LITZ

18 Attorney for HARELL GOLDSTEIN

19 Dated: July ___, 2003

20 By: _____

21 ARTHUR LIEBERMAN

22 In Pro Per

Sup & Order(Dismissal)_30707

1 Date: July ___, 2003

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8 REGENSTREIF LLP

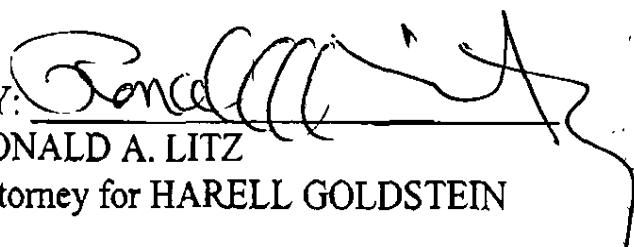
9 By: _____

10 JOSEPH M. GABRIEL

11 Attorneys for Third Party Defendants Peace
12 Arch Entertainment Group Inc. and Immortal
13 Productions Inc.

14 Date: July ___, 2003

15 LAW OFFICES OF RONALD A. LITZ

16 BY: 
RONALD A. LITZ

17 Attorney for HARELL GOLDSTEIN

18 Dated: July ___, 2003

19 By: _____

20 ARTHUR LIEBERMAN
21 In Pro Per

StipOrder(Dismissal)_33707

1 Date: July ___, 2003

PIERSON LAW FIRM A.P.L.C.

2 By: _____
3 JOHN K. PIERSON

4 Attorneys for Third Party Defendants
5 Hilltop Entertainment, LLC

6 Date: July ___, 2003

7 LINER YANKELEVITZ SUNSHINE &
8 REGENSTREIF LLP

9 By: _____
10 JOSEPH M. GABRIEL

11 Attorneys for Third Party Defendants Peace,
12 Arch Entertainment Group Inc. and Immortal
13 Productions Inc.

14 Date: July ___, 2003

15 LAW OFFICES OF RONALD A. LITZ

16 BY: _____
17 RONALD A. LITZ
18 Attorney for HARELL GOLDSTEIN

19 Dated: July ___, 2003

20 By: _____
21 ARTHUR LIEBERMAN
22 In Pro Per

1 **MERO V. WESTERN INTERNATIONAL SYNDICATION, INC.**

2 Case No. 01-06451 CM (BQRx)
2 Reassigned to ED CV 01-851 RT (SGLx)

3 **PROOF OF SERVICE**

4 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

5 I am employed in the County of Los Angeles, State of California. I am over the age of
6 eighteen years and not a party to the within action. My business address is 444 South Flower Street,
7 Sixth Floor, Los Angeles, California 90071.

8 On July 23, 2003, I served the foregoing document(s) described as follows:
9 **STIPULATION OF DISMISSAL OF ENTIRE ACTION PURSUANT TO**
10 **F.R.C.P. RULE 41(a)(1)** on all interested parties in this action

11 () by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the
12 attached mailing list:

13 (X) by placing () the original (X) a true copy thereof in sealed envelope(s) addressed as
14 follows:

15 Gary S. Raskin, Esq. Attorneys for Defendant and Third-
16 Scott J. Tepper, Esq. Party Plaintiff Western International
17 GARFIELD TEPPER & RASKIN Syndication, Inc.
18 1801 Century Park East
19 Suite 2300 Telephone: 310-277-1981
20 Los Angeles, CA 90067-2781 Facsimile: 310-277-1980

21 Christopher L. Rudd, Esq. Attorneys for Third Party Defendants
22 Timothy J. Gorry, Esq. Victor & Grais, Victor & Grais
23 Jackie M. Joseph, Esq. Productions, Mark Victor and
24 Gorry Meyer & Rudd LLP Michael Grais
25 2049 Century Park East, Suite 2100 Telephone: 310-277-5967
26 Los Angeles, CA 90067 Facsimile: 310-277-5968

27 John K. Pierson, Esq. Attorneys for Third Party Defendants
28 Pierson Law Firm A.P.L.C. Hilltop Entertainment, LLC
29 12424 Wilshire Boulevard, Suite 1030 Telephone: 310-826-8009
30 Los Angeles, CA 90025-1043 Facsimile: 310-826-0080

1 Joseph M. Gabriel, Esq.
2 Edward M. Kubec, Esq.
3 LINER YANKELEVITZ, SUNSHINE, &
4 REGENSTREIF, LLP
5 1100 Glendon Avenue, 14th Floor
6 Los Angeles, CA 90024

7 Attorneys for Third Party
8 Defendants **Peace Arch**
9 **Entertainment Group Inc. and**
10 **Immortal Productions Inc.**

11 Arthur Lieberman, Esq.
12 Dickstein, Shapiro, Morin & Oshinsky
13 1177 Avenue of the Americas
14 New York, NY 10036-2714

15 Telephone: 310-500-3500
16 Facsimile: 310-500-3501
17 Associate Counsel for Plaintiff
18 **RENA MERO**

19 Ronald A. Litz, Esq.
20 LAW OFFICES OF RONALD A. LITZ
21 10100 Santa Monica Boulevard, Suite 800
22 Los Angeles, CA 90067
23 Tel: (310) 201-0100
24 Fax: (310) 201-0226

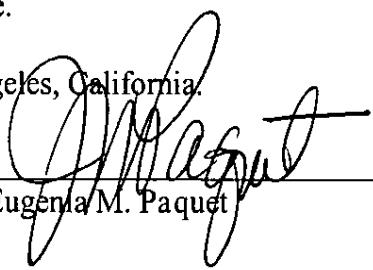
25 (X) **(BY MAIL)** I am "readily familiar" with the firm's practice of collection and processing
26 correspondence for mailing. Under that practice, it would be deposited with U.S. Postal Service on
27 that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course
28 of business. I am aware that on motion of the party served, service is presumed invalid if postal
affidavit.

29 () **(BY FACSIMILE)** By transmitting to the addressee(s) facsimile number, as indicated on
30 the attached service list, a copy thereof. I verified with the addressee(s) that service by facsimile
31 was acceptable and verified the transmission. Thereafter, I placed a true copy thereof in a separate
32 envelope for each addressee named hereafter, addressed to each such addressee respectively. The
33 facsimile transmission was reported as complete and without error.

34 () **(BY UPS Overnight Delivery)** I placed each such envelope in a package designated
35 by the express service carrier with delivery fees paid or provided for, addressed to the person on
36 whom it is to be served, and deposited said package in a box or other facility regularly maintained
37 by the express service carrier as per Code of Civil Procedure Section 1013(c).

38 (X) **(FEDERAL)** I declare that I am employed in the office of a member of the bar of this
39 Court at whose direction the service was made.

40 Executed on July 23, 2003, at Los Angeles, California.

41 
42 Eugenia M. Paquet